

**DISTILLED
SPIRITS
COUNCIL
OF THE
UNITED
STATES**

March 20, 1998

**Dr. C.W. Jameson
National Toxicology Program
Report on Carcinogens
MD EC-14
P.O. Box 12233
Research Triangle Park, NC 27709**

Dear Dr. Jameson:

On behalf of the Distilled Spirits Council of the United States, Inc. (DISCUS), a national trade association representing producers and marketers of distilled spirits and importers of wines sold in the United States, we appreciate the opportunity to provide this comment concerning the proposal to consider beverage alcohol for listing in the National Toxicology Program's (NTP) Ninth Edition of the Report on Carcinogens.

The proposal pending before NTP is whether beverage alcohol should be a candidate for listing by the Agency as a known human carcinogen. In evaluating whether the consumption of beverage alcohol -- beer, wine and distilled spirits -- should be considered for listing in the Ninth Report as carcinogenic to humans, we understand that NTP is charged with determining whether "[t]here is sufficient evidence of carcinogenicity from studies in humans which indicates a causal relationship between the agent and human cancer."

To date, the majority of the studies regarding alcohol and cancer is epidemiologically based. Although numerous animal studies have been conducted, these experiments have failed to demonstrate carcinogenicity. Dr. Emanuel Rubin of Jefferson Medical College of Thomas Jefferson University and Dr. William J. Waddell of University of Louisville School of Medicine, both of whom are well-known by NTP, at the request of the beverage alcohol industry have separately submitted their respective views concerning these studies and NTP's proposed action.

In considering the proposed listing of beverage alcohol, NTP will be required to independently examine and analyze the vast body of beverage alcohol literature. In that regard, alcohol is and has been one of the most studied substances that is consumed by man. The Federal government alone, both intramurally and extramurally, annually expends millions of dollars in alcohol research. Alcohol also is unique in that it is the only substance for which a government agency was created solely to explore its effects -- the National Institute on Alcohol Abuse and Alcoholism (NIAAA) established in 1970.

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In evaluating existing data and literature regarding a substance, we understand that NTP utilizes an established set of criteria and considers relevant information such as "dose response, route of exposure, chemical structure, metabolism, pharmacokinetics, sensitive subpopulations, genetic effects, or other data relating to mechanism of action or factors that may be unique to a given substance." (NTP's September 13, 1996 "Criteria for Listing Agents, Substances or Mixtures in the Report on Carcinogens.")

The consumption of beverage alcohol products -- distilled spirits, beer and wine -- has played an accepted and important role in the cultural and social traditions of American society. Commensurate with this role is the longstanding and continuing commitment by DISCUS members to encourage those adults who choose to drink, to do so responsibly and to combat alcohol abuse in any form. To that end, the industry has joined with government and civic groups in efforts to underscore responsible adult consumption of its products and to address all forms of alcohol abuse, including illegal underage drinking.

We are confident that NTP will proceed in a deliberative manner in examining and analyzing the scientific literature and research regarding beverage alcohol. If we can be of any assistance in this NTP process, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Fred Meister", with a small flourish at the end.

Fred A. Meister
President/CEO

LJO:mdc